## **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Marc E. Hirschfield Nicholas J. Cremona

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ARNOLD SHAPIRO 11/9/96 TRUST; FIRST MARITAL TRUST UNDER THE ARNOLD SHAPIRO TRUST 11/9/96 TRUST; SECOND MARITAL TRUST UNDER THE ARNOLD SHAPIRO 11/9/96 TRUST; DOUGLAS SHAPIRO, in his capacity as Successor Trustee for the Arnold Shapiro 11/9/96 Trust and in capacity as Trustee for

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05053 (SMB)

the First Marital Trust under the Arnold Shapiro 11/9/96 Trust and the Second Marital Trust under the Arnold Shapiro 11/9/96 Trust; MURIEL SHAPIRO, in her capacity as Successor Trustee of the Arnold Shapiro 11/9/96 Trust; and ALAN ABRAMSON, in his capacity as Successor Trustee of the Arnold Shapiro 11/9/96 Trust and in his capacity as Trustee for the First Marital Trust under the Arnold Shapiro 11/9/96 Trust and the Second Marital Trust under the Arnold Shapiro 11/9/96Trust,

Defendants.

## **CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: April 15, 2014.
- 2. The Deadline for Service of Substantive Interrogatories shall be: May 27, 2014.
- 3. Fact Discovery shall be completed by: August 25, 2014.
- 4. The Disclosure of Case-in-Chief Experts shall be due: October 22, 2014.
- 5. The Disclosure of Rebuttal Experts shall be due: November 21, 2014.
- 6. The Deadline for Completion of Expert Discovery shall be: February 20, 2015.
- 7. Deadline to file Notice of Mediation Referral shall be on April 21, 2015.
- 8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: May 5, 2015.
- 9. The Deadline for Conclusion of Mediation shall be: August 19, 2015.

Dated: New York, New York March 14, 2014

## **BAKER & HOSTETLER LLP**

By:/s/ Nicholas J. Cremona\_

David J. Sheehan Marc E. Hirschfield Nicholas J. Cremona 45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4200

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff